

Kramer Levin



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July 26, 2022

Via ECF

The Honorable J. Paul Oetken
United States District Judge
Southern District of New York
40 Foley Square
New York, NY 10007

Re: United States v. Benjamin, No. S2 21 Cr. 706 (JPO)

Dear Judge Oetken:

We write on behalf of our client Brian Benjamin to respectfully request a modification to the conditions of his release to permit him to travel to Virginia and North Carolina from August 19, 2022 to August 29, 2022 for a family trip. While Mr. Benjamin's bail conditions currently include travel to Virginia, we request that he be permitted to travel to North Carolina for a portion of the trip from August 21, 2022 to August 28, 2022. Mr. Benjamin will provide Pretrial Services with a detailed itinerary and continue to abide by all conditions of supervision. The government, by Assistant United States Attorney Jarrod Schaeffer, and Pretrial Services, by Officer Shannon Finneran, have advised that they have no objection to this request.

Respectfully submitted,

/s/ Barry H. Berke

Barry H. Berke
Dani R. James

cc: All Counsel (via ECF)